

An abstract graphic featuring three overlapping circles. Each circle contains several concentric rings. Dashed lines extend from the centers of the circles towards the corners of the slide.

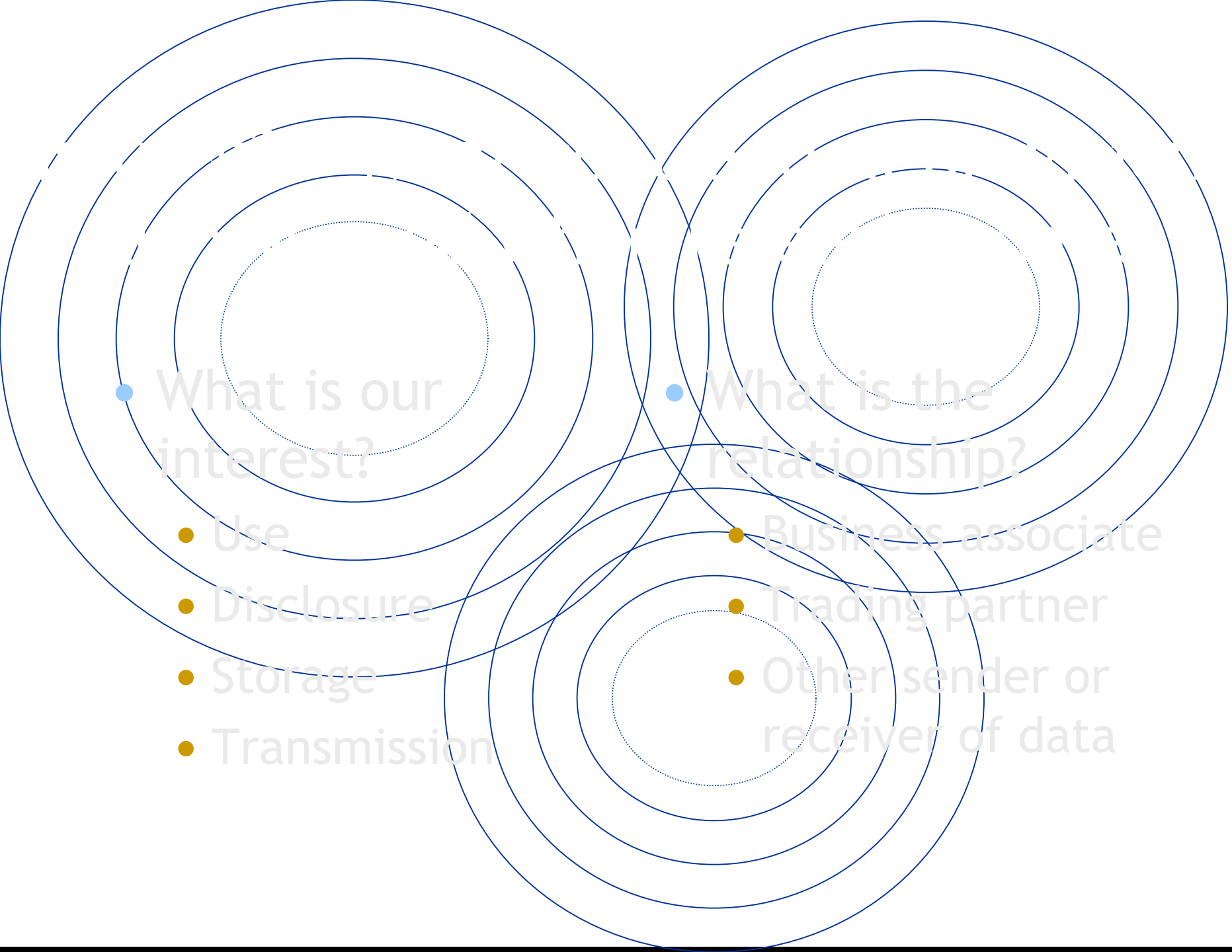
# Issues and Considerations

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## Considerations:

- Determine who is “emancipated”
- Provide emancipated minors with individual rights
- Protect emancipated minors from improper disclosures





## Considerations:

- HHS and CMS materials
- Covered entity status
- Liability
- Data ownership
- MCO preference
- Cost



# Considerations:

- PHI?
- Member authorization or IRB waiver?
- Operations?
- Exception for preparation for research
- Exception for semi-deidentified data?



## Considerations:

- Who gets one?
- Reading level
- Timing (ALAP)
- Stagger mailing
- Translation
- Ongoing process

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- The image features three overlapping circles of equal size, arranged in a triangular pattern. Each circle is composed of three concentric rings: an outer solid blue ring, a middle solid blue ring, and an inner dotted blue ring. The circles overlap such that their central regions intersect. A list of six items, each preceded by a blue dot, is positioned in the central area where all three circles overlap. The text is rendered in a light gray color.
- Designated record sets
  - Combining the privacy/security management function
  - Central management of all disclosures
  - Tracking
  - Verifying identity
  - On-line training



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